

IN THE UNITED STATES DISTRICT COURT
THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

James Jellison
Plaintiff

Vs,

Core Civic

a public held entity.

Mr. Damon Hinniger CEO

Mr. Blair Liebach

Admin warden

Mr. Jerry Wardlow

Deputy Warden

Mrs. Yolanda Pittman

AWOT.

Mrs. Cynthia Pratt

Health Service Administrator

Mrs. Watt

Ass Health Service Administrator.

Mrs. Smith

Mr. Oswald

Unit manager for TTCC,

Sgt J. Garner

Grievance Chair for TTCC,

Defendant(s)

/

VERIFIED CIVIL RIGHT(S) COMPLAINT JURISDICTION AND VENUE..

I

"MAY IT PLEASE THE COURT"

COMES NOW THE Underlain Plaintiff. James Jellison pro se hereby filling this verified Civil Complaint authorized by 42 USC §§ 1981(a) (B)-- 12213 USC 1983 Title II of the Civil rights of the 1964 §§ 504 and 704 (a) of the rehabilitation act of 1973, And the DUE PROCESS CLAUSE OF THE 14th Amendment(s) "The Right to redress act(s) wholly imposed to Abridge Privileges immunities, life, liberty, and/or property, Hereof the citizen(s) of the United States; Under the color of law. "AGGRANDIZED" by the Constitution of the United State(s)" The court(s) has Jurisdiction underlain Plaintiff claim for injunctive Relief declaratory Relief is authorized by USC §§ 2283 and 2202 rule 65 of the FED. P Underlain Plaintiff also; seeks general compensatory and punitive damages.

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U.S. DISTRICT COURT
MID. DIST. TENN.

II
JURISDICTION

1. The Court has Jurisdiction over the Plaintiff(s) claim(s) of Abridge of Federal Constitution right(s) Under 28-usc §§ 1915 (a).

2. The Court has supplemental right(s) Jurisdiction over the Plaintiff(s) state law tort claim(s) Under USC 1367.

I. Previous Lawsuit(s)

A. There has not been any other litigation in State or Federal court relating to the Underlain fact(s) compelled herein.

II. Place of confinement.

Plaintiff James J. Jellison., presently presented the fact(s) herein to the grievance Board at TTCC.

C1. Plaintiff cited "Deliberate Indifference" to a serious Medical need nad/or Medical Malfeasance(s) imposed on a "Qualify(ing) Prisoner"

C2. Every grievance was to no avail none ever seen again by Underlain Plaintiff.

D. & E n/a

F1. Plaintiff contacted Damon Hinnger CEO of Core Civic (Herein Referenced as CC all War ed(s) of TTCC Leibach Warden, Wardlow, Pittman, Health Service Adminstrator(s) Pratt, and Watt, Mrs. Smith FNP of Medical Mrs Oswald unit manager for TTCC B. Building Chronic care Underlain Plaintiff, wrote the above mentioned Defendant(s) and/or filed filed grievance(ss) spoke to in person compelling injury(ies) visually. More over anll exact advising all party(ies) of the denial of medical care, adequate treatment Under the "Deliberate Indifference" and Medical Malfeasance's Standard(s)".

F2. All reply(ies) to Plaintiff(s) numerous letter(s) Grievance(s),, and inpperson Talk(s) (S) went without avail .

"see attached exhibit(s)"

III PARTY(IES)

A. Plaintiff (s) James J. Jellison, is at all times mentioned. Herein the Underlian Plaintiff(s) a person with "Qualify(ied) Disability(ies)" in the custody of the Tenn Department of Correction(s) (herein referenced as TDOC). currently confined at TTCC. Underlian Plaintiff James J. Jellison, Mailing Address @ TTCC 140 Macon Way Hartsville, Tenn 37074.,

Defendant(s)

B.1. Defendant (s) No. 1. Core Civic(CC) is a public held corporation, contracted with the state of Tennessee anll TDOC legally responsible for providing adequate, proper, medical care and/or humane treatment. of Underlian Plaintiff with "Qualifyied Disability(ies)" within accorrdrance of the ADA statute and 8th, 14th Amendent(s) of the U.S. Constitution,

Core Civic(s) responsibility(ies) is "AGGRANDIZED" within the contract with the state of Tennessee and the State Legislature and the TDOC Defendant(s) Core Civic is sued in it(s) individual and corporate (official) capacity through information and belief it can be served with the process at Defendant(s) Headquarter(s) Address @ 10 Burton Hills BLVD Nashville Tenn. 37215.

D.3. Defendant(s) No.3 Blair Liebach, More over an exact is the Administrative Warden for TTCC/TDOC/CC at the facility Underlain Plaintiff reside(s) at Defendant(s) Blair Liebach, at all time(s) was and is currently a pertinent actor for TTCC/TDOC/CC Defendant(s) Blair Liebach and his subordinates are responsible for overseeing the state prisoner(s) confined to TTCC/ TDOC/ CC, The Underlain Defendant(s) are responsible for the Health, Safety and the proper treatment , Humantreatment of James Jellison within accordance of the ADA statute, as to 1,5,6,8, and the 14th Amendment(s) of the U.S. Constitution Defendant(s) Blair Leibach's responsibility(ies) are " AGGRANDIZED" through the Tennessee States Legislature and the TDOC., Defendant(s) Blair Leibach, is being sued in his individual and corporate (official) capacity. Belief and information he can be served with the process at his employment address @ TTCC 140 Macon Way Hartsville, Tenn 37074.

E.4. Defendant(s) No. 4 Jerry Wardlow, More over and exact is a Assio Warden for TTCC/TDOC/ CC at the facility Underlain Plaintiff resides at Defendant(s) Jerry Wardlow, at all time(s) was and/is currently a pertinent actor for TTCC/TDOC/CC., the Defendant(s) Jerry Wardlow and his subordinate(s) are legally responsible for the Health, Safety, and the proper treatment of James J. Jellison, within accordance of the ADA statute, as to 1,5,6,8, and the 14th Amendment(s) of the U.S. Constitution. Defendant(s) Jerry Wardlow's responsibility(ies) is "AGGRANDIZED" through the Tennessee State Legislature and the TDOC., Defendant(s) Jerry Wardlow, is being sued in his individual and corporate (official) capacity through information and belief he can be served with the process at his employment address @ TTCC 140 Macon Way Hartsville Tenn. 37074.

F.5. Defendant(s) NO. 5 Yolanda Pittman, More over and exact is the warden of treatment for TTCC/TDOC/CC at the facility Underlain Plaintiff reside(s) Defendant(s) Yolanda Pittman, at all time(s) was and is currently a pertinent actor for TTCC/TDOC/CC Defendant(s) Yolanda Pittman and her subordinates are responsible for overseeing the state prisoner(s) confined to TTCC/TDOC/CC, The underlain Defendant(s) are responsible for the health, safety, and proper treatment fo James J. Jellison, within accordance of the ADA statute, as to 1,5,6,8, and the 14th Amendment(s) of the U.S Constitution Defendant(s) Yolanda Pittman, responsibility(ies) is "AGGRANDIZED" through the the Tennessee State Legislature and the TDOC., Defendant(s) Yolanda Pittman, is being sued in her individual and corporate (official) capacity through information and belief she can be served with the process at his employment address @ TTCC 140 Macon Way Hartsville, Tenn 37074.

G.6. Defendant(s) No. 6. Cynthia Pratt, More over and exact, is the Health service Administ or for TTCC/TDOC/CC at the facility that Underlain Plaintiff, resides at, Defendant(s) Cynthia Pratt, was and/is a pertinent artor for TTCC/TDOC/CC defendant(s) HSA Cynthia Pratt, i s contracted through the State Legislature, and TDOC hereas legally responsible for oversee ing her sibordinate(s) she is delegated to promulgate rule(s) regulation(s) concurring with in accordance of the ADA statute, and the health, safety basic, adequate medical and huma netreatment. Herein the 8th and the 14th Amendment(s) of the U.S. Constitution Defendant(s)). HSA Cynthia Pratt's, responsibiliy(ies) is "AGGRANDIZED" through the the TENN State Leg islature and TDOC., Defendant(s) Cynthia Pratt, is being sued in her individual and corporate (offical) capacity through inform and beliefs she can be served with the process at her emplo yment @ TTCC 140 Macon Way Hartsvilles Tenn. 37074,.

H.7, Defendant(s) Mrs, Watt, More over and exaot is the Assist Health Service Adminstrator for TTCC/ TDOC/ CC at the facility Underlain Plaintiff resides at Mrs, Watt was and/is a cu pertinent actor for TTCC/TDOC/CC Defendant(s) Watt, is through States Legsilature anll TDOC Hereas legally responsible for for overseeing her subordinate(s)) she is delegated to promul gate rule(s)) curringl within accordance of the ADA statute and the health, safety, basice ad dequate medical, and humane treatment herein the 8th and the 14th Amendment(s) of the U.S. Constitution. Defendant(s) Mrs. Watt, Responsibility(ies) is "AGGRANDIZED" through the St ate Legislature and TDOC., Defendant(s) Mrs. Watt. is being sued in her individual and cor porate (offioal) capacity. through infromation and belief she can be servlced with the pro cess at her employment Address @ TTCC 140 Macon Way Hartsville Tenn. 37074.

I.8. Defendant(s) No.8 Mrs Smith. More over and exact is the FNP for TTCC/TDOC/CC at the f facility that Underlain Plaintiff, resides at defendant(s) Mrs Smith, was and/is a pertin ent actor for TTCC/TDOC/CC Defendant(s) Mrs. Smith, through States Legislature and TDOC he reas legally responsible for overseeing her subordinates she is Delegated to promulgate rules concurring within accordance of the ADA statute and the healht, safety, Basic, adequa te medical nad humane treatment. Herein the 8th and the 14th Amendment(s) Mrs. Smith, resp onsibility(ies) is "AGGRANDIZED" through the States Legislature and TDOC. Defendant(s) Mr sss. Smith is sued in her individual and corporate capacity (offical) through informatio n n and beléifssh can be served with the process at her emploeuement Address @ TTCC 140 Ha rtsville., Tenn. 37074.

J.9. Defendant(s) No.9. Mr. Oswald More over and exaot is the unot manager for TTCC/TDO C/CC the facility Underlain Plaintiff resides at, Defendant(s) Mr. Oswald was and/is a pertinent actor for TTCC/TDOC/CC Defendant(s) Mr. Oswald through the States legislature and TDOC hereas legally responsible for overseeing her subodinate(s) he is Delegated to rule(s) concurring within accordance of the ADA Statute and herein the Health, Safety, and Humane treatment herein the 8th and the 14th Amendmant(s) Mr. Oswald is sued in his

Individual and corporate (official) capacity through information and belief he can be served with the process at his employment address @ TDOC 140 Macon Way Hartsville, Tenn. 37074.

k.10 Defendant(s) No. 10. J Garner. More over and exact she is the Greivance Chair, For TDOC/TDOC/CC the facility Underlain Plaintiff resides at, Defendant(s) Mrs. Garner, is legally responsible for assuring "DUE PROCESS PROTECTION" as the Constitution(s) providing Underlain Plaintiff with redress via procedure includnig hearing(s) through the authority of contratual agreement with the State legislature in accordance of the U.S. Constitution, Defendant(s) J. Garner, responsibility(ies) is "AGGRANDIZED" through the contract with the State of Tennessee, The State Legislature and TDOC Defendant(s) Mrs. Garner is sued in her individual and corporate (official) Capacity through information and belief she can be served with the proecss at her employment address @ TDOC 140 Macon Way Hartsville, Tenn. 37074.

IV EXHAUSTION OF ADMINISTRATIVE REMEDY(IES)

All Claim(s) herein have been submitted through the Administrative grievance Procedure as required uprsuant to 42 USC § 1997 (e) (a) Booth v. Chumer. 532 U.S. 731, 733 (2001); brown v. Yooms. 139 F.3d 1102, 1108- 04 (6th Cir. 1998).

Defendant(s) J. Garner collectively unprocessed and to no avail and/or not logged in

Defendant(s) J. Garner collectively unprocessed and to no avail and/or not logged in Documented failing to comply with policy 501.1 to keep hidden from shraeholder(s) State of Tenn, State legislature(s).

Defendant(s) J. Garner through direct malfeasance(s) to interfere , Underlain Plaintiff(s) filed grievance(s) or safety in filing, From the fear or comfortable without vindictive retaliation; Plaintiff in fear of retribution from the staff. Pursuant to; PLRA 42§§ 1997(e) notes to decision(s), which hold(s):

1. Generally, Civil right(s) of institutionalized persons act which authorized state(s) to set up prison grievance procedures, is exception to normal non-exhaustion Rule and is not intended to apply when Civil right(s) action(s) arise issues which cannot, in all probability, be resolved by grievance resolution system,.....

Defendant(s) J. Garner, grievance chair refused to process Plaintiff(s) Grievance(s) in accordance with policy(ies) ,501.01 denying Plaintiff(s) right(s) to "DUE PROCESS" Plaintiff a hearing : Underlain Plaintiff(s) grievance(s) were shared among inmate worker(s) and security staff including Defendant(s) Leibach, Pittman, Wardlow, in confidentiality clause of policy 501.01 § VI. K11. " RECORD(S) CONCERNING INMATE(S) GRIVANCE(S) SHALL BE KEPT CONFIDENTIAL". wherein convent(s) of vindictive reialation ensure;

Defendant(s) J. Garner. imposed malfeasance and/or act(s) of vindictive retaliation by ordering inmate worker(s) to depose and/or Destroy underlain Plaintiff(s) grievance(s) B

Plaintiff(s) has Affidavit from inmate worker.

"SEE ATTACHED EXHIBIT(S)"

Underlain Plaintiff(s), Attached the above mentioned "Affidavit, Grievance(s) Letter(s), inmate request form(s) to support propoundance(s) of evident(s) and perpetual effort(s) to inform the Defendant(s) of their Abridge of the Underlain Plaintiff(s) protected 1,6.8. and the 14th Amendmetn(s) and right(s) to ADA, Basic, Adequate Medical Care and/or Humane Treatment.

Defendant(s) J. Garner, More over and exact the approximate cause of the severely Diminishing "Quality of Life" and including but not limited to imposed Debilitating condition of Underlain Plaintiff(s); The above mentioned Defendant(s) act(s) of Derogation, interference, Deter and including but not limited to perpetual Malfeasance(s) of Underlain Plaintiff(s) redress will prevent the exposure of their Civil right(s) Abridge. Underlain Plaintiff Has no other, available and/or remedy(ies).

V.
STATEMENT OF FACT(S)

1. Underlain Plaintiff, arrival at TTCC the Date of Sept, 7, 2016., (Hereas Trousdale Turner Core Civic as TTCC).
2. On the Date above mentioned, Underlain Plaintiff(s) consequently was and is a prisoner with "Qualified Disability(ies) a prisoner protected by both Constitutional and Federal statute(s); Hereas some prison regulation(s) for "QUALIFIED PRISONER(S)".
3. The above mentioned Plaintiff has been Diagnosed by a "REASONABLE PHYSICIAN(S)" to suffer from "PTSD, ORTHOPEDIC" mental and physical deprivation intentional "IMMINENT DANGER"
4. On the above mentioned Date of Sept 7. 2016., the Underlain Plaintiff was triaged by a unknown nurse; hereas Plaintiff compelled "Total Medical History" compelling medication's and/or Treatment(s); at this time Plaintiff signed consent to release medical record(s) from Physician(s).
5. On the month(s) to March 21 20, 2017., Underlain Plaintiff hasn't receive any medical treatment(s) and/or any proscribed medication(s).
6. On the foregoing months of approximately 8 month(s); the above mentioned Plaintiff exacerbating condition(s) "Was and/is the Approximate Cause Of Injury" and Substantive Imminent Danger"
7. On the foregoing month(s) the denial of "Basic, Adequate, and/or Humane Treatment, of Plaintiff(s) serious medical and/or "Qualified Disability(ies)" :Is the Approximate cause including but not limited to Magnitudes of mental Psychosis" compelling "Imminent Danger"
8. On the Date of March 23, 2017., the above mentioned Plaintiff, filed sick call form(s), More over and exact, Plaintiff filed 2 sick call form(s) 1 addressing the atrocious pain associated with the need of "Medical attention and/or Mental attention addressing the PTSD" issues(s). including but not limited to Mental psychosis.

9. On the Date of April 7, 2017., the above mentioned Plaintiff, was called to medical for a sick call; The above mentioned sick call(s) were filed March 23, 2017., Hereas Defendant(s) perpetually deny and/or deliberately delay(ied) access to medical personnel, practitioner(s) and includnig but limited to failure to carry out a prescription once proscribed by a physician.
10. On the above mentioned Date Plaintiff was Treiged by RN Whiteing; Plaintiff was asked to state the nature of the medical visit, Plaintiff began his recital of medical fact(s) explaining of preexisting Physician injury(ies) and psychosis, Hereas all mandated; "REASONABLE PHYSICIAN(S)" Plaintiff signed more medical information release paper work and/or form(s).
11. On the Date of April 20, 2017., Plaintiff was called back to medical, Hereas medical record(s) had been forwarded to TTCC medical; from preexisting Physician; Plaintiff was treiged by FNP Mrs Smith as she inquired concerning Plaintiff(s) serious medical need(s), Medication(s) and/or proscribed treatment(s)..
12. On the above mentioned Date, FNR Mrs. Simth, tabulated a treatment plan of the following concurring with Plaintiff(s) Podiatris of "White Foot Wear", Nike fly nit, knee sleeve(s), compression sleeve(s) X ray(ies), pain med(s) mental med(s) and avo(s)-(her eras AVO are physician(s) order(s)) that inmate(s) keep on person to show questioning staff of limited activity(ies). these have(s) were supposed to be written for Bottom bunk, orthopedic shoe(s), Bottom floor, Pain level, limited walking and/or no prolong standing.
13. On the Date of April 25, 2017., Plaintiff attempted direct communication to the the medical official(s) HSA C. Pratt, AHSA Watt, AWOT Pittman, and CEO Damon Hinniger.
14. On the above Date, Plaintiff compelled notice of Abridge of medical policy(ies) 1113, 1113 to a "SUBSTANTIVE MAGNATUBE"; Hereas defendant(s) Abridged the protocol in accordance with Core Civic policy(ies) referring Plaintiff to Physician(s) for diagnosis timely basic, adequate medical and humane treatment.; 113- clinical and nursing protocol(s) state(s) in relevant part;

" SEE ATTACHED EXHIBIT(S)"

§ II Purpose: To establish safe and effective medical treatment of incarcerated offender(s) by establishing uniform guidelines for the identification and care of minor and emergency situation(s).

Those guidelines were established by Defendant(s); Core Civic, Hinniger, Leibach, Wardlow, Pittman, Pratt, and/or Watt under medical department policy(ies).

§ IV. Definition(s) D. Soap format: a medical clinical assessment;

S:= Subjective--patient reported complaint

O:= Objective--examination(s) and diagnostic test(s).

A= Assessment = diagnostic impression(s), rule out.

P= Plan= treatmentplan intervention, follow up.

15. Herein, above mentioned Defendant(s); Core Civic, Hinniger, developed policy(ies) wherein all Nurse(s) C. Pratt, Watt, and including but not limited to Pittman compelling every practitioner, and/or personnel Delegated to treatment at TTCC/TDOC/CC; Herein in upon employment by Authorizing signature(s) consequently conceded Abutment, to these(s) Agreement sanctioned liability(s) to fully, Suffiently: and commence their duty(ies) and responsibility(ies) in treating prisoner(s) i.e., VI. Procedures: A

3. Nursing protocols All Health facility(ies) shall maintain a current copy of the TDOC approved Nursing protocol(s) in their health Service(s) unit Manual. Nursing protocol(s) shall have a cover sheet which serve(s) as a letter of agreement Between the Physician(s) and the appropriate Nursing staff...

" SEE ATTACHED EXHIBIT(S)"

16. Defendant(s) failed to provide on objective examination, consciously misinform Plaintiff telling him..."not to worry!.., Herein as Plaintiff(s) serious and including but not limited to exacerbation reached debilitating state; Defendant(s) indifference and conscious failure to follow protocol, Delegated to protect Plaintiff or provide a treatment plan, Fully Abridge of Plaintiff(s) and/or Tennessee and U.S. Constitution(s), against cruel and inhumane treatment.

17. On the Date of April 26, 2017., Plaintiff(s) was called to the medical and was provided with X ray of both knees done, Plaintiff was informed by X ray Tech and to Plaintiff own sight that the above Plaintiff(s) cartilage and Bilateral Knee More over and exact produced inflammation and atrocious pain from the lack of cartilage and the present(s) of osteoarthritis; to a "SUBSTANTIVE DEBILIITATING MAGNATUBE".

19. On the above mentioned Date, Plaintiff was told by the medical staff More over and exact " I was told by Mrs. Smith, Plaintiff would be called back to the Medical Department to consolidate appain and treatment plan" This was to no avail.

20. On the Date of May 3, 2017., RN Jackson was conducting pill pass in B. Building B. unit the unit Plaintiff was housed at; as Plaintiff as Plaintiff asked RN Jackson to check on Plaintiff(s) Med(s) and proscribed Orthopedic appliance of Knee braces; the direct communication to RN jackson was to no avail.

27. On the Date of May 14, 2017., Plaintiff filed a sick call form stating debilitating pain and non delviery of mandated appliance(s) and Med(s).

22, On the Date of May 28, 2017., the Date of July 31, 2017., the above mentioned Plaintiff wrote HSA Pratt, and AHSA Watty compelling of the triage by FNP Smith all to no avail; Plaintiff forced to top bunk each jump down and/or climb up cause's atrocious pain in Plaintiff informed Mr Oswald and provided Mr. Oswald (unit manger)(with all necessary paper work and showed him and the injury(ies) Mr. Oswald(s) indifference to Plaintiff(s) serious Medical need(s).

VI
CLAIM(S) FOR RELIEF

Claim(s) brought forth for protective injunctive relief against Core Civic official(s) named above as Defendant(s)., Herein Claim(s) Brought forth for" SUBSTANTIVE ABRIDGE OF JAMES J. JELLISON(S) RIGHT(S)" arising Abutment of 1,5,6,8, and the 14th Amendment(s) Magnitude(s) of ADA to a U.S. Constitution...

23. The above mentioned Plaintiff incorporate(s) by reference the allegation(s) contained in paragraph(s) 1. through 22. of this complaint fully set forth above.

~~DEFENDANT(S) REVEREND~~

~~DEFENDANT(S) INDIVIDUAL, AND CORPORATE LIABILITY ACTING~~
"UNDER THE OF STATE LAW"

More over and exact, for more than 8 month's Underlain Plaintiff has been the Grail of Malignant and including but not limited to Wholly Unconstitutional behavior(s) of official(s). Executive(s). More over and exact fully set forth Malfeasance(s) acquiescence of the entire body of official(s) and the Subordinate(s) as the above mentioned: Plaintiff has exhausted all administrative Remedy(ies) available at TTCC /TDOC/CC ; Underlain Plaintiff has attempted direct communication to investigate, or look into the standing matter all the above mentioned Defendant(s); More fully set forth by direct letter(s), inmate request, in person, 3rd party parent(s) phone call(s), communication to investigation team Channel 4. inmate grievance(s).

This persistently Abridge of Civil, Statutory, Duty(ies) to oversee subordinate(S) and promulgate rule(s) ordinance, mandate, law, regulation(s) order, and command compliance within training and to supervise and abridge the present(s) of Malfeasance(s) official acquiescence and/or premeditated "SYSTEMATIC DEFICINC(IES)" in staffing facility(ies) training. medical malfeasance(s) collusive, and/or fallacious procedure(s); Herein conjuring atrocious torture and including but not limited to "IMMINENT DANGER" Perpetual pain and mental psychosis". through act(s) and/or omission Herein, More over and exact set forth Abridge of Officer(s) Employee oath substantive indifference more over and exact compel " IMMINENT DANGER" ...

Fully Set Forth "SUBSTANTIVE ABRIDGE" of 1.5.6.8. and the 14th Amendment(s) to U.S. Constitution

B DEFENDANT No. 2,

Damon Hinniger as the CEO of is legally responsible for all employee(s) of Core Civic and TTCC whose responsibility(ies) including but not limited to assuring the Humane Treatment of Plaintiff.

Damon Hinniger has failed to oversee his staff, assure their compliance with the contract agreed to by his signature between the state of TN, the state legislature, TDOC and Core Civic

Defendant(s) Hinniger Decisively, negligently failed to assure his staff at TTCC, and TDOC comply with TN statute established by TCA §§ 4-3-603 and 4-3-606 as well as Departmental Core Civic Policy(ies) 113.11 Clinical and Nursing Protocol, Which state(s) in part;

II. Purpose to establish safe and effective medical treatment of incarcerated offender(s) by establishing uniform guideline(s) for the detection and care of minor and emergency situation(s)...

Defendant(s) Hinniger, failed to ensure Plaintiff(s) essential "LIFE SAVING" and timely Medical Care Deliberately Delayed essential treatment(s) medical care, medicine(s) fully set forth exacerbating and including but limited to diminishing mental psychosis(after the arrival of medical record(s) to TTCC) Herein Plaintiff attempted Direct communication by letter U.S. mail to this official., to no avail at all time(s)...

Defendant(s) Hinniger, Malicious and Arbitrary act(s) of Deliberate indifference realistically "Deadly Delay" in arresting the exacerbating and including but limited to debilitating state of Health " WITH THE SOLE INTEREST OF PROTECTING CORE CIVIC "PROFIT!"

Defendant(s) Hinniger, act(s) "SUBSTANTIVE" Abridge of 8. and the 14th Amendment(s) to a constitutional Magnitude Imposing Cruel and Inhumane Punishment.

C. DEFENDANT No. 3

Defendant(s) Leibach as the Administrative warden at TTCC/TDOC/CC and is responsible for all safety, security, medical and treatment grievance policy(ies) procedure(s) personnel, appeal, and assuring the Humane treatment of Plaintiff.

Defendant(s) Leibach. has negligently failed to correct the Civil and Constitutional Abridge of his employee(s) at TTCC by delegating his Authority and responsibility(ies) to individuals while failing to oversee their act(s) behavior as well as policy(ies) and constitutional Abridge allowing his staff to... Do as they wish without Accountability..

Defendant(s) Leibach. has implemented this same exact practices throughout this prison where inmates in possession(s) of cell phone(s), Deadly weapon(s), Drug(s), who assault(s) officer(s) attempting and recovering the contraband, and/or rape of other inmate(s) and staff, employee(s) of TTCC., whereas these inmate(s) don't and perpetually receive no "Discipline for these malevolent, Unlawful act(s)" These unlawfull acquiescence act(s) Deliberately done without any consequence(s) and in secret, not reporting this to the commissioner's office to "Protect share holders profit(s)"

Defendant(s) Leibach by his Authority while acting under the color of state law, failed to monitor or correct the action(s) and Behavior of his staff for their refusal to provide Adequate treatment and has refused and perpetually will not address or correct the Malfeasance(s) and Deliberate denial of Due process Hearing(s) retaliation, and "IMMINENT DANGER" by simply "RUBBER STAMPING" Defendant(s) J. Garner(s) refusal to provide "DUE PROCESS" HEARING(S)"

Defendant(s) Leibach, act(s) and omission(s) he has willingly Abridge 1,5, 6,8, and the 14th Amendment(s) Magnitude(s) of U.S. Constitution. this Malfeasance, denial to grievance hearing(s) the right(s) to redress wrong(s) and Defendant(s) Garner continue(s) to direct inmate worker(s) to destroy Grievance(s) to prevent exposure to the media, share holder(s), commissioner(s) office, corporate Core Civic, whereas Plaintiff has Affidavit from inmate worker that was order to destroy grievance(s) "SEE ATTACHED EXHIBIT(S)". This act of official misconduct impose(s) Substantive Abridge of Humane treatment., Whereas this is a perpetual, and on going denial even as this "Honorable Court"...

D . DEFENDANT(S).No.4

Defendant(s) Wardlow, as the warden of surcinty has negligently failed to correct the Civil and Constitutional Abridge of his employee(s) at TTCC by delegating his authority, and responsibility(ies) to underling(s) while failing to oversee their act(s) behavior, as well as policy(ies) and Constitutional Abridge, allowing his staff to....do as they wish without accountability.

Defendant(s) Wardlow, Has implemented this same exact practice through this prison, where inmate(s) in possession(s) of Cell phones(s), deadly weapon(s) and drug(s) who assault(s) officer(s) attempting and recovering the contraband and/or rape of inmate and employee(s) of TTCC, Whereas these inmate(s) don't, and perpetually receive no "Discipline for these malevolent Unlawful Acquiescence act(s)" "Deliberately done without any consequence(s) and in secret, not reporting this to the commissioner's office, Core Civic Corporate Office to protect share holder(s)"profit(s)"

Defendant(s) Wardlow, By his authority while act under the color of law, failing to monitor or correct the action(s) and behavior(s) of his staff for their refusal to provide Basic medical, failure to provide Adequate treatment and has refused and perpetually will not Address or correct the Malfeasance(s) and Deliberate Denial of Due Process Hearing(s) retaliation, and "IMMINENT DANGER" by simply "RUBBER STAMPING" his subordinate(s) refusal to adhere to policy, procedure(s), and ordinance, here at TTCC.

Defendant(s) Wardlow, act(s) and omission(s) he has willingly Abridged 1,5,6,8, and the 14th Magnitude(s) of U.S. Constitution. this Malfeasance(s), denial to grievance(s) hearing(s) the right(s) to redress wrong(s) and Defendant(s) Garner continue(s) to Direct inmate worker(s) to destroy Grievance(s) to prevent exposure to the media, share holder(s) commissioner(s) office Corporate Core Civic Hereas Plaintiff has Affidavit from inmate worker that was ordered to destroy grievance(s) This act of official misconduct impose(s) substantive Abridge of Humane Treatment, whereas this is a perpetual, and on going Denial even as this case is being presented to this "Honorable Court"

E. DEFENDANT(S) No.5

Defendant(s) Pittman, As the warden of treatment(s) has negligently failed to correct the civil and Constitutional Abridge of her employee(s) at TTCC by delegating her Authority, and responsibility (ies) to underlings while failing to oversee their act(s) behavior(s). As well as Policy(ies) and constitutional Abridge, allowing her staff to... Do as they wish without Accountability(ies).

Defendant(s) Pittman, has implemented this same exact practice throughout this prison, where inmates in possession(s) of cell phone(s), Deadly weapon(s) Drug(s), who assault(s) of ficer(s) Attempting and recovering the contraband and/or rape of inmate(s) and employee(s) of TTCC Hereas these inmate(s) Don't and perpetually receive no "Discipline for these Malevolent, unlawful acquiescence(s) and in secret, not reporting this to the commissioner(s) office Core Civic Corporate office to protect share holder(s) Profit(s)"

Defendant(s) Pittman, by her Authority while acting under the color of state law, Failing to monitor or correct the action(s) and behavior(s) of her staff for their refusal to provide Basic medical care failure to provide adequate treatment and refused and perpetually will not Address or correct the Malfeasance(s) and Deliberate Denial of the medical staff fully compelling suffering and including but not limited to ultimately a foreseen Death. Herein fully set forth "IMMINENT DANGER" by simply "RUBBER STAMPING" her subordinate(s) the medical staff by refusal to promulgate adequate medical supply(ies), Adequate follow up care,...

Defendant(s) Pittman, act(s) and omission(s) she has willingly conjured magnitude(s) of Abridge of 1,5,6,8, and the 14 to the "SUBSTANTIVE" U.S. Constitutional, this act of official misconduct impose(s) "SUBSTANTIVE Abridge of humane Treatment, whereas this is a

a perpetual, and on going denial even as this case is presented to this Honorable Court.

F. DEFENDANT(S) No. 6.,

Defendant(s) Pratt, as the Health Service Administrator, for TTCC and believed to be responsible for expediting, promulgating treatment plan(s) of TTCC, By contract Defendant(s) Pratt, is legally responsible for assuring Basic, adequate proper medical care and humane treatment of Plaintiff.

Defendant(s) Pratt, Her responsibility(ies) including but not limited to assuring the Humane treatment of Plaintiff(s) Defendant(s) Pratt, failed to oversee her staff, Who under her direction(s) delaying Plaintiff(s) this vital treatment timely, to prevent Plaintiff(s) Debilitating and/or foreseen Death in the sole interest of "Protecting Core Civic profit(s)" is immoral and unethical in the medical profession furthermore such "DELIBERATE AND ARBITRARY" ACT(S) ARE UNCONSTITUTIONAL" under the 8th Amendment(s) of the U.S. Constitution against Unnecessary Cruel and "Inhumane Treatment" and/or PUNISHMENT" through the 14th Amendment(s). This is immoral and unethical, arbitrary and capricious act; "Potentially a Deadly Delay" contributed to the Diminished Quality of life for Plaintiff.

Defendant(s) Pratt, as a medical professional for Core Civic a " Privately for Profit Corporation", and as a Medical Professional Arbitrary and Capriciously set aside her moral compass in the interest of profit; by failing to provide Plaintiff basic and timely " Medical Treatment Entrusted to her and her staff Defendant(s) Pratt, act(s) and omission(s) she have willingly Abridge 8th and 14th Magnitude(s) of the U.S. Constitution, this act of Official misconduct impose(s) substantive Abridge of Humane treatment, Herein fully set forth "Imminent Danger" whereas this is a Perpetual, and on going denial even as this case is presented to this "Honorable Court"...

G. DEFENDANT(S) No. 7.

Defendant(s) Watt, as the Assistant Health Service Administrator, for Core at TTCC and believed to be responsible for expediting, promulgating treatment plan(s) of TTCC, By contract Defendant(s) Watt is legally responsible for assuring, basic, adequate proper medical care and Humane treatment of Plaintiff.

Defendant(s) Watt, her responsibility(ies) including but not limited to assuring the Humane Treatment of Plaintiff(s) Defendant(s) Watt, Failed to oversee her staff who under her directive(s) delayed Plaintiff(s) this vital treatment timely, to prevent Plaintiff(s) Debilitating and/or foreseen Death immoral and unethical in the medical profession. Furthermore such Deliberate and arbitrary act(s) are Unconstitutional under the the 8, Amendment(s) of the U.S. Constitution against unnecessary Cruel and inhumane Punishment, through the 14th Amendment(s), this immoral and unethical, Arbitrary and Capricious act; "Potentially a Deadly" Contribute to the Diminishing Quality of Life" for Plaintiff.

Defendant(s) Watt, as a medical professional for Core civic a privately for "profit corporation" and as a medical professional arbitrary and capriciously set aside her moral compass in the interest of profit(s); by failing to provide "Plaintiff basic and timely" Medical Treatment entrusted to her and her staff Defendant(s) Watt, act(s) and Omission(s) she have willingly Abridge 8th and the 14th magnitude(s) of U.S. Constitution, this act of official misconduct impose(s) substantive "IMMINENT DANGER" whereas this a perpetual and on going denial even as this case is presented to this "Honorable Court"

HM. DEFENDANT (S) No. 8.,

Defendant(s) Smith, was the nurse Practitioner at TTCC and her responsibility(ies) is to provide Basic, Adequate, Proper medical and humane treatment of Plaintiff Defendant(s) Smith, is responsible for identifying, Diagnosing, proper medical, and Humane Treatment" of prisoner(s) with "Qualify(ied) Disability(ies)"

Defendant(s) Smith, Failed to follow her protocol and assure responsibility(ies) entrusted to her, Abridge her oath to provide Plaintiff appropriate medical care. Defendant(s) Smith, didn't follow the guidelines established to her superiors, Defendant(s) Smith and Core Civic, Hinniger, as outlined in policy(ies) 113.11 Clinical and nursing protocol; SOAP. refused to adhere to Plaintiff(s) assessment refused to schedule Plaintiff(s) to see a Doctor, and by Defendant(s) act(s) and/or omission(s) contributed to the Atrocious suffering and including but not limited to Deminishing "Quality of Life" an actionable decision established under the Deliberate Indifference standard of delay medical and Defendant(s) Smith, hereas conceded to by Abutment, and authorizing signature to contract as an employee(s) of Core Civic and treatment that is protected by "Statute" of the U.S. Constitution.

Defendant(s) Smith, failure... provide an "objective Examination" allowed for a Deminishing Quality" of life that was "Preventable" and caused Extraordinary and unnecessary; emotional, Psychological Physical pain, insomnia, and "DEMINISHIN QUALITY OF LIFE" Under the "DELIBERATE INDIFFERENCE(S) Standard Defendant(s) Smith, Abridge Plaintiff(s) Constitutional right(s) under article(s) 8th and 14th of the U.S. Constitution. Herein this act of official misconduct impose(s) Substantive Abridge of Humane Treatment, fully set forth "IMMINENT DANGER" whereas this is a perpetually and on going Denial even as this case is presented to this "HONORABLE COURT"...

I DEFENDANT(S) No. 9.

Defendant(s) Oswald, was and/is the unit manager for Chronic Care unit(s) B. Building at TTCC and Responsibility(ies) is to provide Safety, and Humane Treatment of Plaintiff(s). Defendant(s) Oswald, Failed to follow protocol and assure responsibility(ies) entrusted to

o him Abridge his oath to provide Plaintiff(s) appropriate, humane treatment Defendant(s) Oswald, Didn't follow the guideline(s) established by his superior(s)

Defendant(s) Core Cive, Hinniger, Leibach, Wardlow, Pittman, as outlined in the oath of officer(s) and employee(s).

defendant(s) Oswald, Failure to implicate, and hold his subordinate(s) liable for their "Unconstitutional Acquiescence(s) Official Misconduct" Allowed for a "Diminishing Quality of life" that was "Preventable" and caused Extraordinary and unnecessary; emotion, psychosomatic physical pain, insomnia, and a "Diminishing Quality of Life" under "Deliberate Indifferent" standard...

Defendant(s) Oswald, Abridged Plaintiff(s) constitutional right(s) under articles 8th and the 14th of the U.S. Constitution.

Herein this act of official misconduct impose(s) "SUBSTANTIVE" Abridge of humane Treatment, Fully set forth "IMMINENT DANGER" whereas this is a perpetually and on going denial ever as this case is presented to the "Honorable Court"...

J DEFENDANT(s) No. 10.,

Defendant(s) Garner, was the grievance chair for TTCC and responsibility(ies) is to provide Plaintiff with the right to redress wrong(s) through "DUE PROCESS HEARING(S)" via the institutional Grievance procedure(s) Policy(ies) 501.01.

Defendant(s) Garner. repeatedly and systematically Plaintiff(s) "DUE PROCESS RIGHT" to be heard at Grievance Hearing(s) in Abridge of Administrative policy(ies) 501.01 in Unconstitutional Acquiescences, Official Misconduct, to hide the medical Malfeasance(s) Herein the 1,5,6,8, and the 14th Amendment(s) of Tenn and the U.S. Constitution(s) in Plaintiff effort to exhaust Administrative Remedy(ies) Pursuant to the PLRA requirement(s) and 42 U.S.C. § 1997e(a) he has timely filed grievance(s) in accordance with Policy(ies), Defendant(s) Garner, continue to not process grievance(s) Plaintiff naming the Defendant(s) for denying Basic, Adequate Medical Treatment, and Humane Treatment,

Defendant(s) Garner, Official Misconduct, Unconstitutional acquiescence(s) Herein she perpetually manipulated Grievance(s) Process and including but not limited to ordering inmate worker(s) to destroy unprocessed Grievance(s), Abridge of the Policy(ies) 501.01 as Defendant(s) Garner, perpetually blocked policy(ies) to appeal and every redress.

Defendant(s) Garner, Knowily Deliberately, Capriciously and Arbitrary Abridge

Plaintiff(s) protected 1,5,6, and the 14th Constitutional right(s) to a Magna
Tude of Abridge of the Amendment(s).

Herein this act of official misconduct impose(s) Substantive, Abridge of H
umane Treatment, fully setforth "IMMINENT DANGER" Whereas this is a perpetua
lly and on going Denial even as this case is presented to this "Honorable
Court"...

CONCLUSION

The named Defendant(s) consciously choose to protect their annual bonuse(
s), and shareholder(s) Profit(s) for Core Civic a "Private Prison". over pro
viding Basic, Adequate, Medical, and Humane Treatment to prisnoer(s) with "Q
ualified Disability(ies)", TO Plaintiff appropriate and timely Diagnosis and
Prevented intentional and purposeful wanton suffering of prison(s) with "Qua
lified Disability(ies)".

Defendant(s) have cleverly Developed and implemented a "Pattern or Design
of Policy(ies) Practice(s)" that encourage ~~cost savnig~~ over providing e
ssentail medical care. These immoral unethical act(s) and Decision(s) are De
fined under the "Deliberate Indifference"...

Defendant(s) primary focuse(s) are well defined and lie(s) in the interes
t of personal bonuse(s) as well as protecting corporate profit(s) over Basic
medical need(s) of anyone, operated by a "Pattern or Desin of policy(ies) pr
actice(s)" with Corporate Email(s) and Directive(s) to " Department Head(s)
of employee(s).

The above mentioned defendant(s) Core Civic, employee(s) established A "Pa
ttern or Design""through policy(ies) Practice(s)" that stressed cost cutting
g During "Staff meeting(s)" to assure Departmental personal secure(s) thei
r " Annual Bonus (s)" some Corporate Offial(s) have in the past as well as t
he present attempted to cover up or justify their repeated past tacit(s) App
roval of their Pattern and Policy(ies) Practice(s) of stressing Bnoue(s) ove
r moral or constitutional protection(s).

Thruogh the Defendant(s) " Pattern and policy(ies) Practice(s) of protecti
ng Core Civic profit(s) for shareholder(s) this act(s)..." Introduced limit
ed medical care" to medical need(s) of inmate(s) as setforth Herein which h
as and continue(s) to compelled Medical malfeasance(s), and including but not
limited to intentional atrocious suffernig resulting in foreseen death Plain
tiff(s) has and contue(s) to suffer unnecessary as a direct result of the Def

Defendant(s) "Deliberate Act(s) of Indifference" and gross negligence, The Denial of Basic, Adequate, proper medical and Humane Treatment, Unequipped and Unprepared for sufficient after care Untrain in the field of psychosis, Orthopedic(s) and as a ward of Core Civic and a ward of the State of Tennessee. Specifically, the Defendant(s) illegally assumed the responsibility(ies) of Plaintiff(s) medical need(s).

Defendant(s) Core Civic and ITCC contracted with a "Single Doctor" who is only at this facility two time(s) a week, allegedly on call and a staff of Nurse(s) the name(s) Defendant(s) are not exempt from Liability for their action(s), acting under the color of state law, as authorized pursuant(s) to: TCA § 4-3-603, 4-3-606, TCA § 41-24-101 through § 41-24-117 and the holdings in:

Wherefore, Above mentioned Plaintiff request that the Court grant the following relief:

A. Issue a declaratory judgment stating that:

1. The "IMMINENT DANGER" imposed upon Plaintiff by the all time(s) present and pertinent Defendant(s) Abridged the above mentioned Plaintiff(s) protected ADA Statute(s) of "Qualify(ied) Disability(ies)" compelling the following 1,5,6,8, and the 14th Amendment(s) of the U.S. Constitution.
2. Defendant(s) above mentioned act(s) and/or omission(s) are the approximate cause of the "Deliberate Indifference" of the above mentioned Plaintiff of serious medical including but not limited to "Qualify(ied) Disability(ies)" compel the Abridge of 8th and the 14th Amendment(s) of the U.S. Constitution.

B. Issue a injunction ordering above mentioned Defendant(s), and/or their agency to:

1. Immediately arrange for the Plaintiff(s) to be examined by a "Qualify(ied) Physician" and adhere to the prescription and/or treatment(s) once prescribed by a reasonable Physician(s).
2. Immediately arrange for the Plaintiff(s) to be overseen by for the need of Physical therapy and/or all follow up medical treatment(s)
3. Immediately arrange and expedite the treatment mandated by Physician(s) Hereof AVO's (AVO hereas a Doctor(s) note) for the following treatment(s): Orthopedic fly nit air sole shoe(s), order for bottom buak, Bottom floor, No prolong standing, Knee brace,

C. N/A

D. Award compensatory damage in the following amount(s):

1. The above Defendant(s) 100,000 jointly and severallt against defend ant(s) for the Physical and emotional injury(ies) substained in the Denial of serious medical treatment(s) including but not limited to refusal to make a reasonable accommodation in likilyness of Plaintiff(s) "Qualify(ied) Disability(ies)".
2. 10,000 jointly and severally against the above Defendant(s) for puni shment, including deprivation of liberty and amenity, and emotional injury(ies) resulting from their denial of due process in connectio n with the Plaintiff(s) denial of the grievance process, hearing(s), and the right to confront the Plaintiff(s) tresspasser(s).
3. 50,000 jointly and severally against the above Defendant(s) for th e Physical and emotional injury(ies) resulting from their failure to provide Adequate medical care and/or humane treatment to Plaintiff (s) with "Qualify(ied) Disability(ies)"

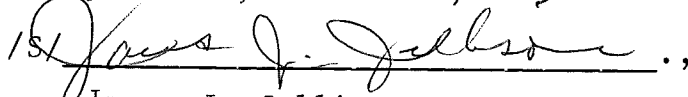
E. Award punitive damages in the following amonnt:

1. 100,000 each agaañst all above Defendant(s).

F. Grant such other relief as it may appear that Plaintiff is entit led.

Date September 10, 2017.,

Respectfully submitted,

/s/ 

James J. Jellison


TTCC

140 Macon Way

Hartsville, Tenn. 37074.

I declare under penalty of perjury that the foregoing is true and cor rect.

Executed on 11/3/17 Date.

Signed by
Power of Attorney

signature of Plaintiff.



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